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Attorneys for Judgment Creditors and Plaintiffs
Erica and Joseph Vago

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
LESLIE KLEIN,
Debtor.

ERICA VAGO and JOSEPH VAGO,
Plaintiffs,
vs.
LESLIE KLEIN and DOES 1 through 10,
Defendants.

Case No. 2:23-bk-10990-SK
Chapter 11
Adv. Case No. 2:23-ap-01150-SK

**STIPULATION FOR ORDER TO
CONTINUE STATUS CONFERENCE**

Present Status Conference Date:
Date: September 6, 2023
Time: 9:00 a.m.
Crtm: 1575

Requested Status Conference Date:
Date: October 18, 2023
Time: 9:00 a.m.
Crtm: 1575

This Stipulation for Order to Continue Status Conference is entered into between Plaintiffs
Erica (“Erica”) and Joseph Vago (“Joseph”) (collectively, the “Vagos” or “Plaintiffs”), and

Defendant, Leslie Klein (“Klein” or “Defendant”). The Plaintiffs and Defendant are collectively referred to herein as the “Parties”.

RECITALS

1. On May 10, 2023, the Vagos filed a complaint against Klein to determine the nondischargeability of certain debts pursuant to 11 U.S.C. § 523 and to deny discharge pursuant to 11 U.S.C. § 727 (“Complaint”) [Docket No. 1].

2. The Parties agreed to extend the deadline for Defendant to file a response to the Complaint to August 15, 2023.

3. On August 14, 2023, Defendant filed his motion for order dismissing certain causes of action in the Complaint (“Motion to Dismiss”) [Docket No. 17].

4. No hearing has yet been set on the Motion to Dismiss.

5. A status conference is presently scheduled for September 6, 2023 (“Status Conference”).

6. The Parties have agreed to continue the Status Conference to a date after the Motion to Dismiss is heard by the Court to enable the Status Conference to be more meaningful to the Parties.

STIPULATION

NOW, THEREFORE, the Parties hereby agree and stipulate that, subject to the approval of the Court:

A. The Status Conference shall be continued from September 6, 2023 at 9:00 a.m. to October 18, 2023 at 9:00 a.m., or such later date and time as the Court deems proper.

Respectfully submitted,

Dated: August 22, 2023

GOE FORSYTHE & HODGES LLP

By: /s/Robert P. Goe
Robert P. Goe
Attorneys for Plaintiffs Erica Vago and
Joseph Vago

1 Dated: August 22, 2023

THE KOGAN LAW FIRM, APC

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3 By: 

4 Michael S. Kogan

5 Attorneys for Defendant Leslie Klein

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Bldg. D., Suite 210, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION FOR ORDER TO CONTINUE STATUS CONFERENCE** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) August 22, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Michael I. Gottfried mgottfried@elkinskalt.com, cavila@elkinskalt.com, lwageman@elkinskalt.com, docketing@elkinskalt.com
- Michael S Kogan mkogan@koganlawfirm.com
- Brian A Procel bprocel@millerbarondess.com, rdankwa@millerbarondess.com; docket@millerbarondess.com
- Nikko Salvatore Stevens nikko@cym.law, mandi@cym.law
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Clarisse Young youngshumaker@smcounsel.com, levern@smcounsel.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) August 22, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) August 22, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 22, 2023

Date

Susan C. Stein

Printed Name

/s/Susan C. Stein

Signature